

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

ZIRJAN AHMED,

Plaintiff,

-vs-

Case No: 13-13639

KEYSTONE SHIPPING COMPANY,

Defendant.

---

O'BRYAN BAUN KARAMANIAN  
DENNIS M. O'BRYAN (P30545)  
Attorney for Plaintiff  
401 S. Old Woodward, Suite 450  
Birmingham, MI 48009  
(248) 258-6262  
(248) 258-6047 - fax  
dob@obryanlaw.net

---

**COMPLAINT**

NOW COMES Plaintiff, by and through counsel undersigned, O'BRYAN BAUN KARAMANIAN, complaining against Defendant as follows:

1. Jurisdiction and venue lie in this action, Defendant conducting business within this forum's boundaries.
2. Jurisdiction is founded under the Jones Act (46 USCA 30104) for negligence, and under the General Maritime Law for unseaworthiness, maintenance, cure, and wages.

3. At all times material to issues herein Plaintiff served as an employee of Defendant serving as a crew member aboard its vessels, with all acts and/or omissions giving rise to this action occurring in the course of Plaintiff's employment in the service of his ship.

4. On or about April 11, 2013, Plaintiff was in the course of his employment when he was ordered by the third mate to heave on the starboard quarter wire when the standing portion of the snatch block rigging gave way and struck Plaintiff because of said unseaworthy condition and failure to provide a safe place to work.

5. Defendant's tortious acts aforesaid caused or contributed to Plaintiff's damages, **inter alia**, as follows:

- a. Pain and suffering, past future;
- b. Mortification, humiliation, fright shock and embarrassment;
- c. Loss of earnings and earning capacity;
- d. Hospital, pharmaceutical and other cure expenses;
- e. Aggravation of prior condition, if any there be;
- f. Inability to engage in social, recreational, and other pursuits previously enjoyed;
- g. Mental anguish;
- h. Found;
- i. Maintenance, cure, wages, attorney fees and/or punitive damages.

WHEREFORE, Plaintiff demands trial by jury and judgment against Defendant, together with interest, costs, attorney fees and expenses, all to be methodically adjusted upwards during the pendency of this cause.

O'BRYAN BAUN KARAMANIAN

/s/ Dennis M. O'Bryan

---

DENNIS M. O'BRYAN (P30545)  
Attorneys for Plaintiff  
401 S. Old Woodward, Suite 450  
Birmingham, MI 48009  
(248) 258-6262  
(248) 258-6047 -f ax  
dob@obryanlaw.net

Dated: August 23, 2013

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

ZIRJAN AHMED,

Plaintiff,

-vs-

Case No: 13-13639

KEYSTONE SHIPPING COMPANY,

Defendant.

\_\_\_\_\_/

O'BRYAN BAUN KARAMANIAN  
DENNIS M. O'BRYAN (P30545)  
Attorney for Plaintiff  
401 S. Old Woodward, Suite 450  
Birmingham, MI 48009  
(248) 258-6262  
(248) 258-6047 - fax  
dob@obryanlaw.net

\_\_\_\_\_/

DEMAND FOR TRIAL BY JURY

NOW COMES Plaintiff by and through counsel undersigned, O'BRYAN BAUN KARAMANIAN, and hereby demands trial by jury in the above-referenced cause of action.

O'BRYAN BAUN KARAMANIAN

/s/ Dennis M. O'Bryan

\_\_\_\_\_  
DENNIS M. O'BRYAN (P30545)  
Attorneys for Plaintiff  
401 S. Old Woodward, Suite 450  
Birmingham, MI 48009  
(248) 258-6262  
(248) 258-6047 - fax  
dob@obryanlaw.net

Dated: August 23, 2013